

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

NEW YORK LIFE INSURANCE COMPANY,

Plaintiff,

C.A. No. 14-74S

V.

MASIELL ORTIZ and JULIA KLAH,

Defendants.

DEFENDANT JULIA KLAH'S RULE 16 CONFERENCE STATEMENT

Defendant, Julia Klah is the mother of Gandy Kaydea. Gandy Kaydea was murdered on March 20, 2013. This action pertains to a life insurance policy that was obtained by Gandy Kaydea on or about November 28, 2012. On that date, Mr. Kaydea signed an individual life insurance application seeking life insurance on his own life in the amount of \$250,000. The insurance company was New York Life Insurance.

Julia Klah is a resident of the State of Pennsylvania. After learning of her son's death, Julia immediately came to Rhode Island with her two daughters, sisters of Gandy Kaydea. Sometime after arriving in Rhode Island Julia learned that the cause of death was determined to be a homicide. She was informed that the Cranston Police Department was conducting an investigation. In the week immediately following the murder of her son, she was busy handling the funeral arrangements while also trying to discover who had been the person that had committed the murder.

Julia Klah learned that the last place her son had been seen on March 20, 2013 was The Institute for the Study and Practice of Nonviolence (ISPN) on Oxford Street, Providence, Rhode Island. At some point during that timeframe, she learned the ISPN had a security system with

cameras that filmed various viewpoints both inside and outside of the Institute's building. During the investigation of this matter, a video was provided for Julia Klah which showed her son Gandy Kaydea leaving the building and getting into a car that was determined to be driven by Reuben Ortiz.

Reuben Ortiz is the uncle of the Defendant Massiel Ortiz. Massiel Ortiz was the girlfriend of Gandy Kaydea and the mother of his baby Milan Eva Ortiz who was born in August 2012. Julia Klah and her family attempted to learn from Massiel Ortiz and the Ortiz Family what had happened to Gandy Kaydea. The Ortiz Family did not cooperate or provide any information concerning the circumstances which led to the murder of Gandy Kaydea.

When Julia and her family were gathering the belongings of Gandy Kaydea following his funeral, they discovered personal paperwork that had been in the car of Reuben Ortiz. Contained within that paperwork were documents which revealed the existence of the life insurance policy. After discovering the life insurance policy, Julia Klah attempted to discover why her son had secured the life insurance policy. (After discovering the life insurance policy, Julia Klah attempted to discover why her son had secured the life insurance policy.) After speaking with her son's friends, Julia Klah learned that Reuben Ortiz had convinced Gandy Kaydea to take out the life insurance policy to provide for the future of his daughter Milian Eva Ortiz. Julia Klah is not sure whether Reuben Ortiz provided the necessary funds to pay for the policy prior to her son's death.

Julia Klah has met with investigators from the Cranston Police Department and provided any information she had concerning her son's death. The only information she has received from the Cranston Police Department and the Rhode Island Attorney General's Office is that this is an open investigation where no one has been ruled out as a suspect.

Julia Klah's Attorney, Richard K. Corley, has not received any further information from the Attorney General's Office or the Cranston Police Department concerning the status of the investigation. As of this date, Julia Klah and her attorney have been unable to receive any reports concerning the investigation that has been conducted by law enforcement.

Julia Klah has filed a cross-claim against the Defendant Massiel Ortiz to attempt to safeguard the proceeds of the life insurance policy until a determination can be made concerning the applicability of the Rhode Island "Slayer Statute", codified in the Rhode Island General Laws, Sec. 33-1.1-11. Julia Klah is hoping that the Cranston Police Department can conclude its investigation into the homicide before the life insurance proceeds are dispersed. Julia Klah hopes to receive the written reports of the Cranston Police Department concerning the investigation in order to conduct her own inquiry into the death of her son. As of this date, she has been unable to secure any reports because this is an open law enforcement investigation.

It is expected that during the discovery process records from the Cranston Police Department can be secured and depositions can be conducted to investigate the applicability of the Rhode Island Slayer Statute in this case.

Respectfully Submitted,

/s/ Richard K. Corley, Esq. #2965
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CERTIFICATION

I certify that the within document was electronically filed with the Clerk of Court on April 9, 2014, and that it is available for viewing and downloading from the Court's ECF system. Service by electronic means has been effectuated on all counsel of record.

/s/ Richard K. Corley, Esq. #2965